

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

\* \* \* \*

UNITED STATES OF AMERICA )

Plaintiff, )

v. )

SEBASTIAN GHEORGHE )

Defendant. )

CASE NO. 2:14-cr-00137-KJD-NJK  
CASE NO. 2:13-CR-00272-LDG-CWH

DEFENDANT'S SENTENCING REQUEST

Comes Now, Defendant Sebastian Gheorghe, by and through his counsel of record Richard A. Schonfeld, Esq., of the law offices of Chesnoff & Schonfeld, and hereby submits his Sentencing Request.

This Sentencing Request is made and based upon the attached Memorandum of Points and Authorities, the papers and pleadings on file herein, and any argument heard by the Honorable Court.

DATED: January 12, 2016.

  
RICHARD A. SCHONFELD, ESQ.

Nevada Bar No. 6815

CHESNOFF & SCHONFELD

520 South Fourth Street

Las Vegas, Nevada 89101

Tel: (702) 384-5563

**MEMORANDUM OF POINTS AND AUTHORITIES**

The government and the Defendant are in agreement as to the sentence that will be requested of this Honorable Court. The parties will request that the Court find an adjusted offense level of 19 on Count One with a guideline range of 30 to 37 months (under a Criminal History Category III). The parties will request a sentence of 30 months on Count One.

The parties will request that this Honorable Court then impose a consecutive sentence of 24 months on Count Two. The total aggregate sentence will be 54 months in case number 2:14-CR-00137-KJD.

The parties will then request that this Honorable Court sentence Mr. Gheorghe to a term of one month in custody in case number 2:13-CR-00272-LDG-CWH to run consecutive to the 54 month sentence in case number 2:14-CR-00137-KJD.

The total aggregate sentence as a result of both cases will be 55 months.

The parties agree that Mr. Gheorghe has been in custody on case number 2:14-CR-00137-KJD since his arrest on March 22, 2014 and that the credit for time served should apply to said case from that date forward.

As a result of the current posture of the case, there are no outstanding objections to the PSI Report.

Dated this 12<sup>th</sup> day of January, 2016.

CHESNOFF & SCHONFELD



Richard A. Schonfeld, Esq.  
520 S. 4<sup>th</sup> Street  
Las Vegas, Nevada 89101  
(702) 384-5563